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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, AFL-CIO,
et al.,

Plaintiffs,

V.

DONALD J. TRUMP, in his official capacity
as President of the United States, et al.,

Defendants.

Case No. 3:25-cv-03698-SI

**DECLARATION OF TYLER WOODARD
IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY INJUNCTION**

DECLARATION OF TYLER WOODARD

I, Tyler Woodard, declare as follows:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.

2. I am the Research Director for Service Employees International Union Local 521 (SEIU Local 521). I have been employed by SEIU Local 521 for approximately 4 years. My office is located at 2302 Zanker Road, San Jose, California 95131.

3. SEIU Local 521 is a labor organization and unincorporated association headquartered in San José, California. SEIU Local 521, an affiliate of the Service Employees International Union, represents over 72,000 members who work for cities, counties, public schools, public offices of education, public hospital districts, transit authorities, federally qualified healthcare clinics, private non-profits, and Head Start childcare agencies in the state of California, and who operate family childcare provider services. SEIU Local 521's members live and work throughout the state, including in the counties of San Mateo, Santa Clara, Santa Cruz, Monterey, and San Benito. The members represented by SEIU Local 521 work in most classifications in county and public district hospitals, social services agencies, and in Head Start agencies and family provider childcare settings.

4. SEIU Local 521's mission is to provide our members with a voice in the workplace, in their union, and in the larger community. Through our actions, our union and our members strive to create a more just and humane society. We are committed to protecting and improving the lives of workers and their families. We will work to improve and protect the services we provide to our communities. We believe that by working together as a united front, we can win better contracts and build industry power in the region.

5. As the exclusive representative for our bargaining units, SEIU Local 521 helps workers negotiate robust collective bargaining agreements (CBAs) with their employers; files grievances and arbitrates issues to enforce these CBAs; and provides other support, assistance, and resources to bargaining unit employees.

1 6. In my capacity as the SEIU Local 521 Research Director, I perform financial
 2 analysis and provide policy support for contract negotiations and organizing efforts. As a result,
 3 I am familiar with the broad range of jobs performed by SEIU Local 521 members.

4 7. I have seen reporting on the Trump administration's executive order instructing
 5 federal agencies to substantially reduce the federal workforce through reductions in force (RIF),
 6 close regional offices and agency departments, and reassign programs and services from one
 7 agency to another. We are already experiencing and expect to experience more devastating,
 8 irreparable cascading effects for frontline city and county workers, like SEIU Local 521
 9 members, who provide crucial educational, health, safety, and welfare services to the public, as
 10 described below.

11 8. For instance, SEIU Local 521 represents Head Start workers who rely on federal
 12 employees in the Office of Head Start (OHS) regarding county and city grants. Head Start grants
 13 are awarded in increments of five years, but programs are required to apply for and receive
 14 annual approval from OHS to continue providing child care services. Grant recipients must
 15 receive an annual Notice of Award from OHS to continue access to the Payment Management
 16 System (PMS), which pays for operating expenses and payroll.

17 9. SEIU Local 521 members, parents, and children depend on a Head Start grant that
 18 funds a local child care program for approximately 900 preschoolers and 300 infants and
 19 toddlers, and is up for renewal on June 30, 2025. Prior to March 31, 2025, Santa Clara County
 20 Office of Education (COE)¹ employees consulted with federal staff at OHS's regional office in
 21 San Francisco to receive guidance and direction for submitting their application to continue the
 22 Head Start services provided under the current grant. COE employees timely submitted the
 23 application, and anticipated that the renewal would be approved because they had followed
 24 OHS's guidance and there was no competing applicant. However, the grant proposal has not yet
 25

26 1 This declaration clarifies that the Head Start program at issue is operated by the Santa Clara County Office of
 27 Education, not the County of Santa Clara. This declaration supersedes the Declaration of Elena Medina Neuman,
 paragraph 21, with respect to the operator of the program.

1 been approved. COE employees do not know whom to contact for guidance because the federal
2 employees they previously worked with have all been laid off. Given the uncertainty regarding
3 who at OHS will process the application submitted to the now-closed San Francisco OHS
4 regional office, and when the renewal grant will be approved, the COE's interim superintendent
5 notified staff in the early learning services program that they will be laid off on July 1, 2025,
6 unless OHS issues a Notice of Award. Up to 144 SEIU Local 521 members are subject to these
7 layoffs. The delay or lack of approval for COE's grant will result in 1,200 children (and their
8 parents) in Santa Clara County losing child care on July 1, 2025.

9 10. By way of another example, SEIU Local 521 members work for the Santa Clara
10 Housing Authority (SCCHA), the largest provider of affordable housing assistance in Santa
11 Clara County. The SCCHA administers the HCV Program, and SEIU Local 521 members
12 perform a wide range of functions that facilitate the administration of the program.

13 11. Staffing cuts and office closures at the Department of Housing and Urban
14 Development (HUD) will harm the SCCHA, SEIU Local 521 members, and California residents.
15 As a local administrator of a federal program, the SCCHA receives substantial funds from HUD
16 and administers approximately 20,000 vouchers in the County. It relies on the timely processing
17 of grants and prompt disbursement of grant funds, the collection of local data, and the
18 development and maintenance of local relationships to ensure the success of local initiatives and
19 partnership amongst stakeholders. The SCCHA must also document certain categories of
20 information about the housing vouchers that they assigned and submit this information to HUD.

21 12. SEIU members fear that impending staffing shortages at HUD will delay grant
22 funding and the release of federal voucher funds. Even a temporary delay in funding would
23 imperil users of the SCCHA's services, and would likely cause furloughs or layoffs of SEIU
24 Local 521 members.

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1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct. Executed May 14, 2025, in San Jose, California.

3 *Tyler Woodard*
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